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Attorneys for Defendant Advanced Health Media, LLC

## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY TRENTON DIVISION

CALL, INC. d/b/a MEDFORCE,

Plaintiff,

v.

ADVANCED HEALTH MEDIA, LLC,

Defendant.

Civil Action No. 3:11-CV-03723-FLW-TJB

Hon. Freda L. Wolfson, U.S.D.J. Hon. Tonianne J. Bongiovanni, U.S.M.J.

NOTICE OF MOTION TO DISMISS PURSUANT TO FED. R. CIV. P. 12(b)(6)

**ELECTRONICALLY FILED** 

TO: Donald Robinson, Esq.
Robinson, Wettre & Miller LLC
One Newark Center – 19<sup>th</sup> Floor
Newark, New Jersey 07102
Attorneys for Plaintiff

PLEASE TAKE NOTICE that on the 3rd day of October, 2011 at 9:00 a.m., or as soon thereafter as counsel may be heard, OlenderFeldman LLP, counsel for Defendant Advanced Health Media, LLC, shall move before the Honorable Freda L. Wolfson, U.S.D.J., at the Federal District Court for the District of New Jersey located at Clarkson S. Fisher Federal Building and U.S. Courthouse, 402 E. State Street, Trenton, New Jersey 08608, Room 5050 for an Order dismissing Plaintiff's Complaint pursuant to Fed. R. Civ. P. 12(b)(6).

PLEASE TAKE FURTHER NOTICE that in support of this motion, Defendant shall rely upon its Memorandum of Law submitted herewith. Defendant also submits herewith a proposed form of Order.

PLEASE TAKE FURTHER NOTICE that Oral Argument is respectfully requested in

the event opposition to Plaintiff's Motion is filed.

Date: September 6, 2011

By: // // // // // MICHAEL J. FELDMAN

Attorneys for Defendant

Advanced Health Media, LLC